

# Metropolitan Telecommunications

## New Jersey 271 Re-Filing Issues

**Note: This presentation is Redacted for Public  
Distribution**

# Overview

- Effective competition is predicated on operational viability
- Verizon's New Jersey systems are not effectively operationally viable
- The result of these problems are barriers to effective competition

# MetTel Issues

- A strong, open and reliable Operational Support System (OSS) is essential for open competition
- Three of the main components of a strong, open and reliable OSS are:
  - Timely Provision of Local Service Request Confirmations (LSRCs) and Rejects
  - Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)
  - Timely and Accurate Resolution of Trouble Tickets

## **Local Service Request Confirmations (LSRCs) and Rejects**

- Despite MetTel requests for the data “Flat Files” dating back to the State Hearings, the November to February files are not scheduled to arrive until the week of April 22. Therefore MetTel has constructed an average response time distribution for MetTel’s unique workload using the data supplied by Verizon on February 25 (File “Feb 25 MetTel Part 2 Attachment A – WeightedAvg - MetTel-LRSC+REJ.xls” to define the percentage workload for the 2, 24, 48 and 72 hour response periods

# OSS Issues Chart 1: LSRC/Reject Analysis:

## Comparison of Responses (Local Service Request Confirmation/Reject) Between New Jersey, and Pennsylvania

Total For June, July, August, October (through 10/26/01), November and December 2001					
	Average Hours From Send to LSRC/ Reject	Standard Deviation in Hours From Send to LSRC/ Reject	Hours to Achieve 95% Response	Workload Derived Weighted Time Standard based on Data From The Verizon Response To The MetTel Ex Parte	% Actual 95% Achievement Is greater Than Weighted Time Standard
New Jersey	15Hr 48Min	60Hr 38Min	69Hr 17Min	18 Hr 3 Min	383.90%
Pennsylvania	5Hr 58Min	23Hr 38Min	22Hr 25Min	8 Hr 57 Min	250.50%

## **Local Service Request Confirmations (LSRCs) and Rejects**

- Attachment 2 of the McLean/Wierzbicki/ Webster/Canny Supplemental Declaration did not list (Redacted) PONs sent by MetTel during the November – December 2001 period
- Using the data from Attachment 2 in lieu of missing information which normally would have been provided on the missing “Flat Files” yields the following comparison to Verizon’s reported results

# OSS Issues Chart 2: LSRC/ Reject Metrics Comparison

## NJ LSRC / Reject Performance

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Hrs	MetTel Calculated% Achieved	Verizon Calculated% Achieved
200111	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2	97.23%	97.40%
200111	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24	90.26%	97.52%
200111	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72	100.00%	100.00%
200111	NJ	UNE	OR-2-02	OT Reject FlowThrough	2	96.57%	95.58%
200111	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24	93.31%	98.35%
200111	NJ	UNE	OR-2-06	OT Reject FC - POTS	72	100.00%	100.00%
200111	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2	83.33%	83.33%
200111	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24	81.25%	100.00%
200111	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72	100.00%	100.00%
200111	NJ	Resale	OR-2-02	OT Reject FlowThrough	2	84.62%	84.62%
200111	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24	95.24%	100.00%
200111	NJ	Resale	OR-2-06	OT Reject FC - POTS	72	100.00%	100.00%
200112	NJ	UNE	OR-1-02	OT LSRC FlowThrough	2	99.27%	98.59%
200112	NJ	UNE	OR-1-04	OT LSRC/ASRC no FC - POTS	24	77.65%	98.17%
200112	NJ	UNE	OR-1-06	OT LSRC/ASRC FC - POTS	72	100.00%	100.00%
200112	NJ	UNE	OR-2-02	OT Reject FlowThrough	2	95.45%	100.00%
200112	NJ	UNE	OR-2-04	OT Reject no FC - POTS	24	90.09%	98.57%
200112	NJ	UNE	OR-2-06	OT Reject FC - POTS	72	100.00%	100.00%
200112	NJ	Resale	OR-1-02	OT LSRC FlowThrough	2	100.00%	100.00%
200112	NJ	Resale	OR-1-04	OT LSRC/ASRC no FC - POTS	24	82.61%	100.00%
200112	NJ	Resale	OR-1-06	OT LSRC/ASRC FC - POTS	72	100.00%	100.00%
200112	NJ	Resale	OR-2-02	OT Reject FlowThrough	2	100.00%	100.00%
200112	NJ	Resale	OR-2-04	OT Reject no FC - POTS	24	87.84%	95.06%
200112	NJ	Resale	OR-2-06	OT Reject FC - POTS	72	100.00%	100.00%

## **Local Service Request Confirmations (LSRCs) and Rejects**

- Delayed Confirmations/Rejects result in CLEC inability to provide information to End Users
- Delayed Confirmations/Rejects result in CLEC inability to promptly engage in activities necessary to migrate or service the End User
- Delayed Confirmations/Rejects result in a loss of End User confidence in the CLEC as a quality service provider



## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- For the period of June, July, August, October (through 10/26/01), November and December 2001:
  - Verizon required 30 days to transmit 95% of NJ Billing Completion Notices (BCN) after the work has been completed
  - Verizon required 12 days to transmit 95% of NJ Billing Completion Notices (BCN) after the billing systems had been posted.

# OSS Issues Chart 3: Timeliness of BCN to Work Completion and Time between BCN Creation and Receipt

## Comparison of System Transactions Between New Jersey Pennsylvania and NY

For the Months of June, July, August, October 2001 (through 10/26/01),  
November and December 2001

	Average Days Between PCN CD and BCN Receipt	Standard Deviation in Days Between PCN CD and BCN Receipt	50% (In Days)	95% (In Days)	Average Days Between BCN CD and BCN Receipt	Standard Deviation in Days Between BCN CD and BCN Receipt	50% (In Days)	95% (In Days)
New Jersey	5	5	4	30	1	3	0	12
Pennsylvania	2	3	1	7	0	2	0	2
NY	2	2	1	5	0	2	0	0

NJ Metric OR 4-09 Standard is 95% SOP to Bill Completion Within 3 Business days

Provisioning Completion Notice Completion Date is the date on which the work was completed

Billing Completion Notice Completion Date is the date the Billing System was updated to reflect the work completion

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- For the months of November 2001, December 2001 and January 2002 Verizon did not provide MetTel with service that passed NJ Metric OR 4-09 “SOP to Bill Completion Within 3 Business Days

# OSS Issues Chart 4:

## NJ Metric OR 4-09 Analysis

### NJ Metric 4-09 "% SOP to Bill Completion Within 3 Business Days

Period	State	Platform	Metric	Metric Name	Standard = 95% in: X Days	MetTel Calculated% Achieved	Verizon Calculated% Achieved
200111	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	72.41%	87.96%
200112	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	79.94%	96.45%
200201	NJ	UNE	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	79.60%	91.59%
200111	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	0.00%	85.71%
200112	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	50.00%	86.36%
200201	NJ	Resale	OR-4-09	% SOP to Bill Completion Within 3 Business Days	3	33.33%	83.33%

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- Absent the BCN generation End User usage is not accrued and properly transmitted to the gaining CLEC.
- Given that the Daily Usage File (DUF) exceeds 95% in 4 days, if a BCN is delayed more than 4 days does the losing CLEC receive the usage?
- Absent the BCN generation, the Loss of Line Report (LoL) to the losing carrier is not generated and transmitted.
- Absent the BCN generation, the gaining carrier cannot engage in subsequent transactions other than repair issues.

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- The result of delayed BCN generation and transmittal is double billing as there is a period where the losing CLEC has not received the LoL and the gaining CLEC later bills retroactively to the provisioning date
- The result of delayed BCN generation and transmittal is inordinately high End User bills when the delayed usage is transmitted
- The result of delayed BCN generation and transmittal is CLEC inability to provide competitive customer service.

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- The result of delayed BCN generation and transmittal is an End User impression of the CLEC as a unreliable service provider with higher bills than promised

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- The notifiers transmitted by Verizon certify the work requested has been completed, analysis of the expected results indicates this is not the case
- CLECs have no other information source as an alternative to the Verizon notifiers and must rely upon them
- CLECs incur significant costs (time & money) to identify and remediate the “false” notifiers
- Issues which arise during the identification/ remediation period cause the CLEC to appear (to the End User) to be a low quality provider



## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- For the period of November and December 2001
  - 38.93% of End User Migrations to MetTel were not completed as per the BCN (22.67% showed usage commencing after 3 days from the work completion date and 16.25% showed no usage)
- MetTel examines usage based on the Usage Record Date i.e. the date the End User incurred the usage (i.e Date of Record) as presented on the Verizon Daily Usage File
  - This usage is utilized to verify the validity of the completion notifier by testing for the expected result

# OSS Issues Chart 5: Migration Accuracy Issues:

## *NJ Migration Accuracy Analysis*

For the months of November and December 2001

Period	# of Migrations	Usage Starting 3 Days from PCN CD		Usage Starting 7 Days from PCN CD		No Usage as of February 4 , 2002		Total Late and no Usage	
		# of Migrations	%	# of Migrations	%	# of Migrations	%	# of Migrations	%
NJ	Redacted	Redacted	22.67%	Redacted	15.73%	Redacted	16.25%	Redacted	38.93%

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- MetTel has examined the Migration performance issue by type of account and day of provisioning
- In an attempt to define patterns, MetTel has examined the performance issue as a percentage of daily performance and overall total performance and the possible variants
  - The most discernable pattern is that Wednesday work (the highest volume day) has a 50% probability of having delayed or missing usage
  - All other days show a marked probability of having on time usage

# OSS Issues Chart 6:

## Migration Accuracy Issues: By Account Type

*November - December Migration BCN Accuracy by  
Account Type: Percentages By Day*

Account Type	Migration Completion Date	Migration BCN Accuracy				Grand Total
		Late or No Usage		Timely Usage		
		#	%	#	%	
Business	Monday	Redacted	23.26%	Redacted	76.74%	Redacted
	Tuesday	Redacted	11.11%	Redacted	88.89%	Redacted
	Wednesday	Redacted	7.06%	Redacted	92.94%	Redacted
	Thursday	Redacted	21.21%	Redacted	78.79%	Redacted
	Friday	Redacted	17.14%	Redacted	82.86%	Redacted
	Saturday	Redacted	0.00%	Redacted	100.00%	Redacted
Business Total		Redacted	15.28%	Redacted	84.72%	Redacted
Pay Phone	Monday	Redacted	100.00%	Redacted	0.00%	Redacted
	Tuesday	Redacted	66.67%	Redacted	33.33%	Redacted
	Wednesday	Redacted	50.00%	Redacted	50.00%	Redacted
	Thursday	Redacted	85.71%	Redacted	14.29%	Redacted
	Friday	Redacted	45.45%	Redacted	54.55%	Redacted
Pay Phone Total		Redacted	60.71%	Redacted	39.29%	Redacted
Residential	Monday	Redacted	12.50%	Redacted	87.50%	Redacted
	Tuesday	Redacted	0.00%	Redacted	100.00%	Redacted
	Wednesday	Redacted	63.48%	Redacted	36.52%	Redacted
	Thursday	Redacted	19.23%	Redacted	80.77%	Redacted
	Friday	Redacted	4.76%	Redacted	95.24%	Redacted
Residential Total		Redacted	53.92%	Redacted	46.08%	Redacted
Grand Total		Redacted	38.93%	Redacted	61.07%	Redacted

# OSS Issues Chart 7:

## Migration Accuracy Issues: Pattern Analysis

### November - December Migration BCN Accuracy by Migration Day

Account Type	Migration BCN Accuracy				Grand Total		% Late or no Usage to % Grand Total	% Timely Usage to % Grand Total
	Late or No Usage		Timely Usage					
	#	%	#	%	#	%		
Monday	Redacted	21.67%	Redacted	78.33%	Redacted	7.86%	1.70%	6.16%
Tuesday	Redacted	11.11%	Redacted	88.89%	Redacted	7.08%	0.79%	6.29%
Wednesday	Redacted	52.57%	Redacted	47.43%	Redacted	58.58%	30.80%	27.79%
Thursday	Redacted	25.25%	Redacted	74.75%	Redacted	12.98%	3.28%	9.70%
Friday	Redacted	17.65%	Redacted	82.35%	Redacted	13.37%	2.36%	11.01%
Saturday	Redacted	0.00%	Redacted	100.00%	Redacted	0.13%	0.00%	0.13%
Grand Total	Redacted	38.93%	Redacted	61.07%	Redacted			

# OSS Issues Chart 8:

## Migration Accuracy Issues: Pattern Analysis

*November - December Migration BCN Accuracy by  
Account Type: Percentages to Overall Total*

Account Type	Migration Completion Date	Migration BCN Accuracy				Grand Total
		Late or No Usage		Timely Usage		
		#	%	#	%	
Business	Monday	Redacted	1.31%	Redacted	4.33%	Redacted
	Tuesday	Redacted	0.52%	Redacted	4.19%	Redacted
	Wednesday	Redacted	0.79%	Redacted	10.35%	Redacted
	Thursday	Redacted	1.83%	Redacted	6.82%	Redacted
	Friday	Redacted	1.57%	Redacted	7.60%	Redacted
	Saturday	Redacted	0.00%	Redacted	0.13%	Redacted
Business Total		Redacted	6.03%	Redacted	33.42%	Redacted
Pay Phone	Monday	Redacted	0.13%	Redacted	0.00%	Redacted
	Tuesday	Redacted	0.26%	Redacted	0.13%	Redacted
	Wednesday	Redacted	0.39%	Redacted	0.39%	Redacted
	Thursday	Redacted	0.79%	Redacted	0.13%	Redacted
	Friday	Redacted	0.66%	Redacted	0.79%	Redacted
Pay Phone Total		Redacted	2.23%	Redacted	1.44%	Redacted
Residential	Monday	Redacted	0.26%	Redacted	1.83%	Redacted
	Tuesday	Redacted	0.00%	Redacted	1.97%	Redacted
	Wednesday	Redacted	29.62%	Redacted	17.04%	Redacted
	Thursday	Redacted	0.66%	Redacted	2.75%	Redacted
	Friday	Redacted	0.13%	Redacted	2.62%	Redacted
Residential Total		Redacted	30.67%	Redacted	26.21%	Redacted
Grand Total		Redacted	38.93%	Redacted	61.07%	Redacted

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- For the period of December 20, 2001 through February 2002:
  - 37.38% of MetTel Suspensions for Non Payment (SNP) were not completed as per the BCN (30.58% showed usage after the suspension completion date and before the restoral completion date and 6.8% showed continued usage with no restoral of service

# OSS Issues Chart 9: Suspension For Non Payment Accuracy Issues Analysis

## *SNP Accuracy Analysis*

For the Period 12/20/01 through 2/28/02

As of March 27,2002

Period	# of Orders	Usage After the SNP PCN CD and Prior to the Restoral PCN CD		Usage After the SNP PCN CD with no Restoral					Total			
		# of Orders	%	# of Orders	%	# items on LOL Prior to first Usage	Net	Net %	# of Orders	%	Net	Net %
Total	Redacted	Redacted	30.58%	Redacted	11.17%	Redacted	Redacted	6.80%	Redacted	41.75%	Redacted	37.38%



## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- For the period of January - February 2002 period:
  - 22.89% of MetTel restoration of service were not completed as per the BCN (18.07% showed usage commencing after 3 days from the work completion date and 4.82% showed no usage)

# OSS Issues Chart 10: Restoral Accuracy Issues Analysis

## *NJ Restoral Accuracy Analysis*

As of March 27, 2002

For January and February 2002

Period	# of Orders	Usage start 3 days from PCN CD		No Usage					Total			
		# of Orders	%	# of Orders	%	# items Disconnected 7 Days, or less from BCN CD	Net	Net %	# of Orders	%	Net	Net %
Total	Redacted	Redacted	18.07%	Redacted	4.82%	Redacted	Redacted	4.82%	Redacted	22.89%	Redacted	22.89%

## **Timely and Accurate Provisioning Completion Notices (PCNs) and Billing Completion Notices (BCNs)**

- MetTel verifies the PIC change by examining Cat 11 (Carrier Access Usage) records (according to the methodology specified by Verizon staff) to test that the terminating IXC is the selected one
  - 9.7% of PIC Change transactions show usage to a predesignated carrier other than the one indicated on the Verizon BCN

## OSS Issues Chart 11: PIC Change Analysis Issues

### *CIC Change First Call - December Analysis*

State	Category	First CIC as Requested to 5237	First CIC not as Requested (1)	No CIC Record
NJ	First CIC after CIC Change by PON	48.09%	9.66%	42.25%
	First CIC after CIC Change by TN	60.29%	9.09%	30.62%
PA	First CIC after CIC Change by PON	43.75%	0.00%	56.25%
	First CIC after CIC Change by TN	50.00%	0.00%	50.00%
NY	First CIC after CIC Change by PON	35.27%	5.07%	59.66%
	First CIC after CIC Change by TN	40.50%	5.51%	54.00%

### *CIC Change - Total Calls Distribution*

State	Calls Routed to Requested CIC	Calls Routed to other CIC
NJ	54.97%	45.03%
PA	100.00%	0.00%
NY	76.94%	23.06%

# Timely and Accurate Resolution of Trouble Tickets

- When Verizon Notifiers are delayed and MetTel issues a Trouble Ticket requesting information, Verizon does not respond with the information in a commercially viable timeframe
  - Verizon only resolved 68% of MetTel Trouble Tickets within 3 days.
  - Of the remaining 32%, Verizon provided incorrect information for 78% of the PCN and 50% of the BCN
  - Verizon required 43 days to resolve 95% of the MetTel Trouble Tickets

# OSS Issues Chart 12:

## Trouble Ticket Status Issues

### *Trouble Ticket Status*

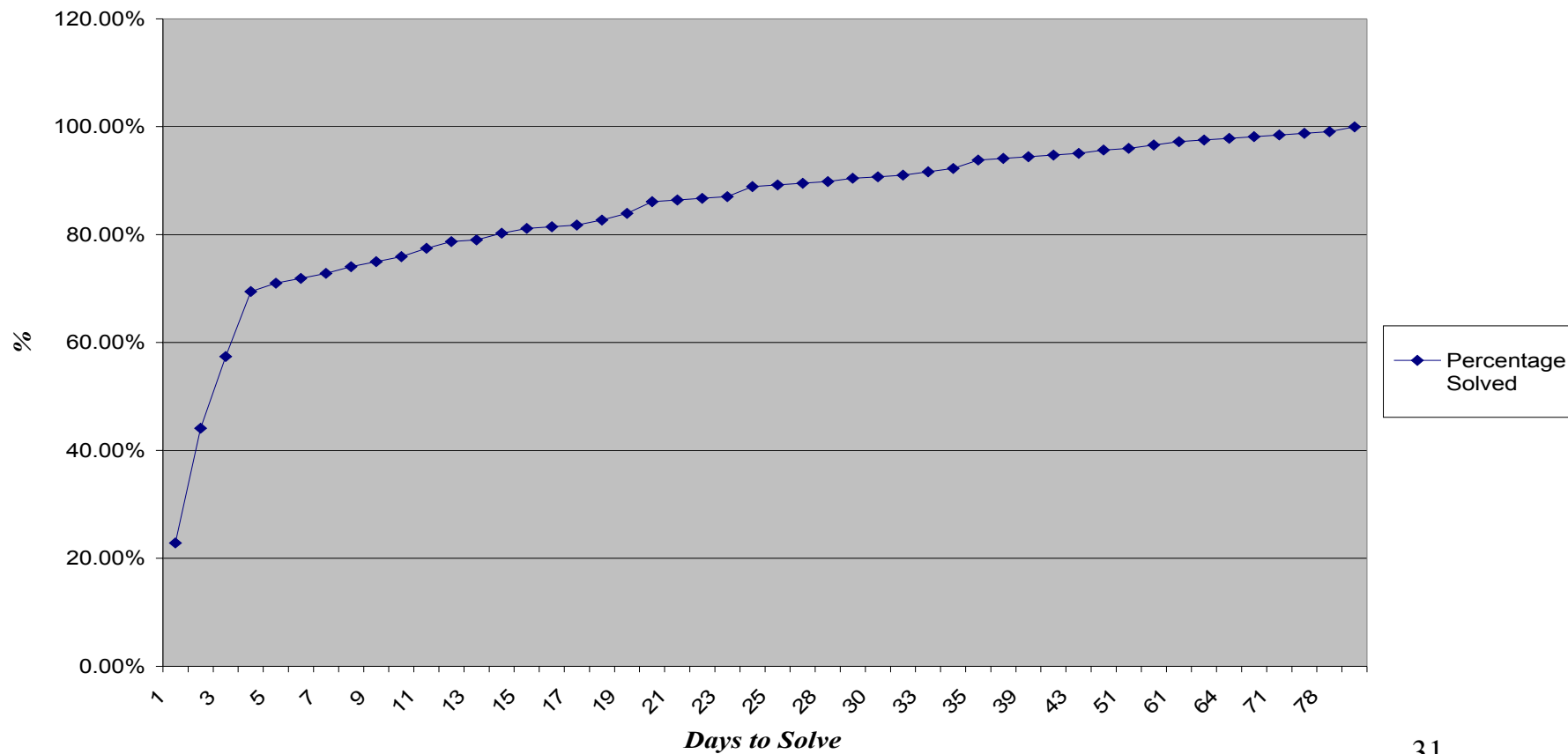
Total for the period June, July, August, October 2001 (through 10/26/01), November and December 2001

State	Solved in 3 Business Days	Solved in More Than 3 Business Days	Not Solved	Total not Solved in 3 Business Days
NJ	67.89%	32.11%	0.00%	32.11%
PA	62.69%	35.82%	1.49%	37.31%
NY	52.52%	47.48%	0.00%	47.48%

FCC 00-92: "The ticket is considered cleared when Bell Atlantic has either requested the CLEC to resubmit the PON or communicated the current status of the PON and provided the delayed status notifier to the CLEC>"

# OSS Issues Chart 13: Trouble Ticket Aging

**Resolution Aging Analysis of NJ PONs on Trouble Tickets**  
*as of March 7th, 2002*



# OSS Issues Chart 14: Missing Notifier Analysis Issues

**Analysis of Missing Completion Notifiers (BCN,PCN) Provided After 3 Business Days From TT Opening Date For June, July, August, October (Through 10/26), November and December 2001**

Answers provided by Verizon to TT	Number of Items where FOC CDD is Prior to TT Opening	Number of Items where Completion Date is Prior to TT Opening	Number of Items on PCD Report	Remarks
<b>Total: NJ</b>	99.15%	98.72%	0.00%	
<b>Total: PA</b>	100.00%	97.58%	0.00%	
<b>Total: NY</b>	100.00%	91.08%	1.78%	



# OSS Issues Chart 15:

## Missing Notifier Analysis Issues

***Analysis of Missing Completion Notifiers (BCN,PCN) Provided After 3 Business Days From TT Opening Date For June, July, August, October (Through 10/26), November and December 2001***

Answers provided by Verizon to TT	Requested Notifier	% of Items where FOC CDD is Prior to TT Opening By Type of Requested Notifier		% of Items where Completion Date is Prior to Trouble Ticket Initiation By Type of Notifier		Status Provided					
						Status Provided is at a Lower Level than the Requested Notifier Or No Status Provided		Status Provided is the Level of the Requested Notifier		Status Provided is at a Higher Level than the Requested Notifier	
		Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier	Provisioning Completion Notifier	Billing Completion Notifier
Total: NJ	PCN	100.00%		95.38%		61.54%		21.54%		16.92%	
	BCN		98.82%		100.00%		49.70%		50.30%		0.00%
Total: PA	PCN	100.00%		91.43%		28.57%		11.43%		60.00%	
	BCN		100.00%		100.00%		51.69%		48.31%		0.00%
Total: NY	PCN	100.00%		90.24%		58.74%		3.70%		37.55%	
	BCN		100.00%		93.13%		59.53%		40.47%		0.00%

# Provisioning/Billing Issues

- Verizon's Retail to Wholesale conversion process contains potential significant problems.
- Conversions with Billing Completion Notices certifying complete conversion to MetTel are being Retail Billed to MetTel while wholesale usage is appearing on the DUF .



# **Provisioning/Billing Issues Chart 1**

**MetTel Accounts with VZ Retail Bills**

**Redacted**

# Conclusion

- MetTel is NOT addressing the Usage issue as an item of missing records to be addressed from a Billing perspective
- Rather, it is used as a methodology to test and verify expected results based on the transactions Verizon purports as correctly completed
- This analysis highlights serious deficiencies in Verizon's OSS which preclude effective competition

# Conclusion (continued)

- The NJBPU Consultative Report is based on incomplete information
- MetTel's unique analyses demonstrate that Verizon's OSS requires remediation before it is adequate for open and free competition